

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**TAYLOR MANN.**

**Plaintiff,**

**v.**

**Q DIRECTIONAL DRILLING LLC  
D/B/A THE DIRECTIONAL DRILLING  
COMPANY,**

**Defendant.**

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**CIVIL ACTION NO. 4:15-cv-02995**

## JURY TRIAL DEMANDED

## STIPULATION OF DISMISSAL WITH PREJUDICE

Plaintiff Taylor Mann and Defendant Q Directional Drilling LLC d/b/a The Directional Drilling Company submit the following *Stipulation of Dismissal With Prejudice* under Federal Rule of Civil Procedure 41(a)(1)(A)(ii):

1. Plaintiff is Taylor Mann. Defendant is Q Directional Drilling LLC d/b/a The Directional Drilling Company.
2. On October 13, 2015, Plaintiff sued Defendant.
3. Defendant has been served with process and has filed an answer but has not filed a motion for summary judgment.
4. This case is not a class action under Federal Rule of Civil Procedure 23, a derivative action under Rule 23.1, or an action related to an unincorporated association under Rule 23.2.
5. A receiver has not been appointed in this case.
6. This case is not governed by any federal statute that requires a court order for dismissal of the case.
7. This lawsuit has been voluntarily resolved on the merits, and the parties' settlement

requires its dismissal with prejudice.

8. Plaintiff has not previously dismissed any federal or state court suit based on or including the same claims as those presented in this case.

9. Defendant consents to this dismissal.

10. This dismissal is *with* prejudice.

11. Each party shall bear his or its own costs and attorneys' fees.

Respectfully submitted,

KENNEDY HODGES, L.L.P.

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ATTORNEYS FOR DEFENDANT

### **CERTIFICATE OF SERVICE**

I certify that on August 23, 2016, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record:

/s/ Don J. Foty  
Don J. Foty